



ENVIRONMENTAL SERVICES  
1190 Corporate Center Dr.  
Oconomowoc, WI 53066  
Tel.: (262) 569-5857

May 17, 2017

ES17-L-101  
131.3.40

Kenneth Herstowski  
U.S. EPA Region 7  
300 Minnesota Ave  
Kansas City, KS 66101-2912

**Re: Response to EPA's Notice of Preliminary Findings, Silgan Containers Manufacturing Corporation, Burlington, IA 52601  
EPA ID: IAR000521237**

Dear Mr. Kenneth Herstowski:

Silgan Containers Manufacturing Corporation – Burlington, IA ("Silgan") responds herein to the above-referenced Notice of Preliminary Findings (NOPF) pursuant to the Resource Conservation and Recovery Act ("RCRA") inspection on May 2, 2017. The EPA's NOPF is directed to Silgan's facility located at 3725 Division St, Burlington, IA 52601.

These responses are based upon a review of company files that are known to likely contain documents, records, and information relevant to the Notice of Preliminary Findings. Silgan reserves the right to supplement this response consistent with EPA's request.

**Finding 1:** Failure to label a satellite container with the words "Hazardous Waste" or have its contents identified (40 CFR 262.34(c) (1) (ii)).

- A. Silgan had two drums of Non-Hazardous Solid Draw & Ironed (D&I) Waste without labels on them.

**Response:** Silgan placed Non-Hazardous Labels on the drums identifying them as Solid Draw & Ironed (D&I) Waste.

**Finding 2:** Failure to keep a satellite container closed except when adding or removing waste (40 CFR 262.34 (c) (1) (i) – 40 CFR 265.173 (a)).

- A. Silgan had a satellite container holding Non-Hazardous Solid D&I waste open with the drum lid resting on top of the drum.

**Response:** Silgan closed the drum with a locking drum ring.

RCRA 5/17/2017



565992

**Finding 3:** Failure to mark a hazardous waste container with an accumulation start date (40 CFR 262.34 (a) (2)).

- A. Silgan had eight (8) containers, holding Hazardous Liquid D&I waste, without dates on the hazardous waste labels.

**Response:** Silgan placed dates on the drum labels. Dates were traced back to when the coatings were run.

**Finding 4:** Failure to have adequate weekly inspections at a hazardous waste container accumulation area (40 CFR 262.34 (a) (1) (i) - 40 CFR 265.17).

- A. Silgan performed weekly inspections and documented them, but overlooked several drums when performing the inspection(s).

**Response:** Silgan placed dates on the drum when they were generated. Dates were traced back to when certain coatings were run. Retraining on waste inspections was performed on May 4, 2017.

**Finding 5:** Failure to provide adequate aisle space for type of container management and emergency equipment used (40 CFR 262.34(a) (4), 265.35).

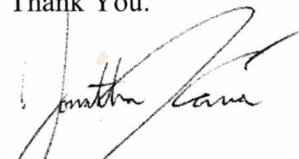
- A. Hazardous waste containers were stored at the time of inspection with the inability to walk around the containers.

**Response:** Silgan positioned the drums with 3 feet of aisle space on each side of the containers.

Pursuant to EPA's NOPF, Silgan may produce records, documents, or copies in support of the responses above.

We trust the information provided sufficiently responds to the EPA's request to respond to the Notice of Preliminary Findings. Should you require any further information or if you have questions, please call me at 262-569-5857 or contact me at [jkania@silgancontainers.com](mailto:jkania@silgancontainers.com).

Thank You.



Jonathan Kania  
Environmental Services  
Silgan Containers Manufacturing Corporation

## **Finding 1 & Finding 2: Corrective Action Supporting Evidence**



# NON DOT-HAZARDOUS MATERIAL

NON-DOT REGULATED MATERIAL USED OIL PER 40 CFR 279

NAME: USED OIL

USED OIL

EPA ID: 18000001237

VULCAN CONTAINERS MANUFACTURING CORPORATION

3720 DIVISION ST

BURLINGTON, VA 22031

CUST ITEM

CUST ONR

START DATE

UN: 15342.1

LOC

TRK

WGT

PC

CMT

LN





# NON DOT-HAZARDOUS MATERIAL

NON DOT-HAZARDOUS MATERIAL

NAME: GOLDEN WASTE INC.

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]

DATE: 10/10/2001

BY: [Signature]

FOR: [Signature]



# Analytical Report

**ENVISSION Laboratories, Inc.**  
1439 Sadlier Circle West Drive  
Indianapolis, IN 46239  
Tel: 317.351.8632  
Fax: 317.351.8639  
www.envisionlaboratories.com

**Client Name:** SILGAN CONTAINERS

**Project ID:** BURLINGTON WASTE

**Client Project Manager:** JONATHAN KANIA

**ENVISSION Project Number:** 2017-804

**Analytical Method:** TCLP\* VOC Method 5035A/8260B

**Prep Method:** EPA 1311

**Analytical Batch:**

**Client Sample ID:** SOLID D & I WASTE

**Envision Sample Number:** 17-5537

**Sample Matrix:** solid

**Sample Collection Date/Time:** 3/22/17 15:00

**Sample Received Date/Time:** 3/24/17 10:20

<u>Compounds</u>	<u>Sample Results (mg/L)</u>	<u>Reporting Limit (mg/L)</u>	<u>Flags</u>
Benzene	0.14	0.1	
Methyl ethyl ketone (MEK)	< 0.2	0.2	
Carbon Tetrachloride	< 0.1	0.1	
Chlorobenzene	< 0.1	0.1	
Chloroform	< 0.1	0.1	
1,2-Dichloroethane	< 0.1	0.1	
1,1-Dichloroethene	< 0.1	0.1	
Tetrachloroethene	< 0.1	0.1	
Trichloroethene	< 0.1	0.1	
Vinyl Chloride	< 0.04	0.04	
Dibromofluoromethane (surrogate)	102%		
1,2-Dichloroethane-d4 (surrogate)	92%		
Toluene-d8 (surrogate)	100%		
4-bromofluorobenzene (surrogate)	90%		
Analysis Date/Time:	3-27-17/18:07		
Analyst Initials	gjd		

\* TCLP analysis is not included in our NELAC accreditation.



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**Client Name:** SILGAN CONTAINERS

**Project ID:** BURLINGTON WASTE

**Client Project Manager:** JONATHAN KANIA

**ENVision Project Number:** 2017-804

**Analytical Method:** TCLP\* BNA Compounds Method 3510C/8270C

**Prep Method:** EPA 1311

**Analytical Batch:** 032717TCLP

**Client Sample ID:** SOLID D & I WASTE

**Envision Sample Number:** 17-5537

**Sample Matrix:** solid

**Sample Collection Date/Time:** 3/22/17 15:00

**Sample Received Date/Time:** 3/24/17 10:20

<u>Compounds</u>	<u>Sample Results (mg/L)</u>	<u>Reporting Limit (mg/L)</u>	<u>Flags</u>
1,4-Dichlorobenzene	< 0.1	0.1	
2,4-Dinitrotoluene	< 0.1	0.1	
Hexachlorobenzene	< 0.1	0.1	
Hexachlorobutadiene	< 0.1	0.1	
Hexachloroethane	< 0.1	0.1	
o-Cresol	< 0.1	0.1	
m&P-Cresol	< 0.1	0.1	
Nitrobenzene	< 0.1	0.1	
Pentachlorophenol	< 0.5	0.5	
Pyridine	< 0.5	0.5	
2,4,5-Trichlorophenol	< 0.1	0.1	
2,4,6-Trichlorophenol	< 0.1	0.1	
2-Fluorophenol (surrogate)	21%		
Phenol-d6 (surrogate)	58%		
Nitrobenzene-d5 (surrogate)	37%		
2-Fluorobiphenyl (surrogate)	58%		
2,4,6-Tribromophenol (surrogate)	33%		
p-Terphenyl-d14 (surrogate)	47%		
Analysis Date/Time:	3-29-17/09:44		
Analyst Initials:	ajg		
Date Extracted:	3/27/2017		
Initial Sample Volume:	200 mL		
Final Volume:	1.0 mL		

\* TCLP analysis is not included in our NELAC accreditation.



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**Client Name:** SILGAN CONTAINERS

**Project ID:** BURLINGTON WASTE

**Client Project Manager:** JONATHAN KANIA

**ENVision Project Number:** 2017-804

**Analytical Method:** TCLP\* Metals 6010B ICP / 7471A Mercury

**Prep Method:** EPA 1311

**Client Sample ID:** SOLID D & I WASTE

**Envision Sample Number:** 17-5537

**Sample Matrix:** solid

**Sample Collection Date/Time:** 3/22/17 15:00

**Sample Received Date/Time:** 3/24/17 10:20

<u>Compounds</u>	<u>Sample Results (mg/L)</u>	<u>Reporting Limit (mg/L)</u>	<u>Flags</u>
Arsenic	< 0.01	0.01	
Barium	< 0.1	0.1	
Cadmium	< 0.005	0.005	
Chromium	< 0.01	0.01	
Lead	<b>0.075</b>	0.01	
Mercury	< 0.002	0.002	
Selenium	< 0.01	0.01	
Silver	< 0.05	0.05	

**Analysis Date/Time:** 3-28-17/14:15

**Analyst Initials:** gjd

**Date Digested:** 3/27/2017

**Initial Sample Volume:** 50 ml

**Final Volume:** 50 ml

**Analytical Batch:** 032817icp

**Hg Analysis Date/Time:** 3-28-17/11:21

**Hg Analyst Initials:** ajg

**Date Digested:** 3/28/2017

**Initial Sample Volume:** 50 ml

**Final Volume:** 50 ml

**Analytical Batch:** 032817hg

\* TCLP analysis is not included in our NELAC accreditation.





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**Client Name:** SILGAN CONTAINERS

**Project ID:** BURLINGTON WASTE

**Client Project Manager:** JONATHAN KANIA

**ENVision Project Number:** 2017-804

**Client Sample ID:** SOLID D & I WASTE  
**Envision Sample Number:** 17-5537  
**Sample Matrix:** solid

**Sample Collection Date/Time:** 3/22/17 15:00  
**Sample Received Date/Time:** 3/24/17 10:20

**Analyte**

**Sample Results**

**Flags**

**Method**

pH 8.55 @ 25 deg C  
Analysis Date/Time: 03-24-17/12:30  
Analyst Initials LLL

N 9045C



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**Client Name:** SILGAN CONTAINERS

**Project ID:** BURLINGTON WASTE

**Client Project Manager:** JONATHAN KANIA

**ENVision Project Number:** 2017-804

<b>Client Sample ID:</b>	SOLID D & I WASTE	<b>Sample Collection Date/Time:</b>	3/22/17	15:00
<b>Envision Sample Number:</b>	17-5537	<b>Sample Received Date/Time:</b>	3/24/17	10:20
<b>Sample Matrix:</b>	solid			

### Analyte

Flash Point—Closed Cup

### Sample Results

Flash @ 140 deg F

Wrong Method

### Flags

N

### Method

1010A-M

**Analysis Date/Time:** 3/27/2017

**Analyst Initials** jc

**CERTIFICATE OF ANALYSIS**

Silgan Containers  
Attn: Johnathan Kania  
3725 Division St  
Burlington, IA 52601

Client Code: TK0000586  
PO Number:  
Report Date: 05/03/2017  
Entry Date: 04/28/2017



Eurofins Sample Code: 200-2017-04280008

Sample Condition: Acceptable  
Sample Description: Solid D&I Waste B

**Test**

**TK442 - Flash Point-Small Scale CC ASTM D3278**  
Flash Point, Small Scale Closed Cup

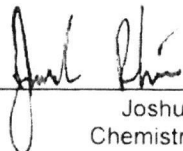
**Result**

>233 °F

**Method Reference**

ASTM D 3278/D 3828

Respectfully Submitted,  
Eurofins Scientific, Inc.



Joshua Rhein  
Chemistry Manager

Results shown in this report relate solely to the item submitted for analysis.  
All results are reported on an "As Received" basis unless otherwise stated.  
Reports shall not be reproduced except in full without written permission of  
Eurofins Scientific, Inc.

## Jonathan Kania

---

**From:** dnorris@envisionlaboratories.com  
**Sent:** Wednesday, May 10, 2017 7:23 AM  
**To:** Jonathan Kania  
**Subject:** RE: Solid D&I Waste

Jon,

We are in the process of re-running the flashpoints. I believe we have figured out the error. I watched the analyst run the flashpoint on one of the samples and it produced a blue "halo" around the opening of the cup. The analyst mistakenly recorded that as the flashpoint. It is not. I am asking our QA officer to observe the re-running of the samples and will get you the revised results as soon as I can.

I apologize for this error and will get it fixed ASAP.

Thank you,  
David E. Norris  
Client Services Manager  
ENVision Laboratories, Inc.  
1439 Sadlier Circle West Drive  
Indianapolis, IN 46239  
ph: 317-351-8632  
fax: 317-351-8639

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----- Original Message -----

Subject: RE: Solid D&I Waste  
From: Jonathan Kania <JKania@Silgancontainers.com>  
Date: Mon, May 08, 2017 3:29 pm  
To: "dnorris@envisionlaboratories.com"  
<dnorris@envisionlaboratories.com>

David,

We suspect something is wrong with these results. We submitted split samples of the same material to another lab in which it tested out at 233F. They used ASTM 3278 and Envision used 1010A-M. If you could please give us a detailed reason for the difference.

Thanks.

Jonathan Kania, CHMM  
Environmental Services  
Silgan Containers  
Office: 262.569.5857  
Cell: 630.418.2079





Analytical Report

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1439 Sadlier Circle West Drive  
Indianapolis, IN 46239  
Tel: 317.351.8632  
Fax: 317.351.8639  
[www.envisionlaboratories.com](http://www.envisionlaboratories.com)

**Client Name:** SILGAN CONTAINERS

**Project ID:** SOLID D & I WASTE

**Client Project Manager:** JON KANIA

**ENVision Project Number:** 2017-1157

<b>Client Sample ID:</b>	SOLID D & I WASTE A	<b>Sample Collection Date/Time:</b>	4/27/17	8:00
<b>Envision Sample Number:</b>	17-7846	<b>Sample Received Date/Time:</b>	4/28/17	10:15
<b>Sample Matrix:</b>	solid			

<u>Analyte</u>	<u>Sample Results</u>	<u>Flags</u>	<u>Method</u>
Flash Point - Closed Cup	No Flash @ 212 deg F	N	1010A-M
Analysis Date/Time:	5/11/2017		
Analyst Initials	JC		

### **Finding 3 & Finding 4: Corrective Action Supporting Evidence**

# HAZARDOUS WASTE

## UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)

D001

WS: 151842-4

LN:

MTN:

LOC:

TRX:

PROF:

PC:

CNTR:

EPA ID: IAR000521237

SILGAN CONTAINERS MANUFACTURING CORPORATION  
3725 DIVISION ST.  
BURLINGTON, IA 52601

CUST DEPT:

CUST CNTR:

CUST ITEM:

START DATE:

4/1/17

# HAZARDOUS WASTE

## UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)  
D001

WS: 151842-4

MTN:

LOC:

TRX:

PROF:

PC:

EPA ID: IAR000521237

SILGAN CONTAINERS MANUFACTURING CORPORATION

3725 DIVISION ST.

BURLINGTON, IA 52601

CNTR:

CUST DEPT:

CUST CNTR:

CUST ITEM:

3/1/00  
START DATE:



# HAZARDOUS WASTE

## UN1993

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UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)

D001

WS: 151842-4

LINE:

MTN:

LOC:

TRX:

PROF:

PC:

CNTR:

EPA ID: IAR000521237

SILGAN CONTAINERS MANUFACTURING CORPORATION

2725 DIVISION ST.

BURLINGTON, IA 52601

CUST DEPT:

CUST CNTR:

CUST ITEM:

START DATE:

3/1/17

# HAZARDOUS WASTE

## UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993.WASTE FLAMMABLE LIQUIDS, N.O.S.,3,PGII,(BUTANOL,METHYL ISOBUTYL KETONE),ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)  
D001

WS: 151842-4

MTN:

LN:

LOC:

TRX:

PROF:

PC:

CNTR:

EPA ID: IAR000521237

SILGAN CONTAINERS MANUFACTURING CORPORATION

3725 DIVISION ST.

BURLINGTON, IA 52601

CUST DEPT:

CUST ITEM:

CUST CNTR:

START DATE:

3-21-17



# HAZARDOUS WASTE

## UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)  
D001

WS: 151842-4  
LN:  
MTN:  
LOC:  
TRX:  
PROF:  
PC:  
ONTR:

EPA ID: IAR000521237  
SILGAN CONTAINERS MANUFACTURING CORPORATION  
3725 DIVISION ST.  
BURLINGTON, MA 01803

CUST DEPT:  
CUST NAME:

CUST ONTR:

START DATE: 2-17-90

# HAZARDOUS WASTE

## UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)  
D001

EPA ID: IAR000521237  
SILGAN CONTAINERS MANUFACTURING CORPORATION  
3725 DIVISION ST.  
BURLINGTON, IA 52601

CUST DEPT:

CUST ITEM:

CUST CNTR:

WS: 151842-4

MTN:

LN:

LOC:

TRX:

PROF:

PC:

CNTR:

START DATE:

2/10/17



# HAZARDOUS WASTE

## UN1993

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. If found, contact the nearest Police or Public Safety authority or the U.S. Environmental Protection Agency.

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)

WS: 151842-4

MTN:

LN:

LOC:

TRX:

PROF:

PC:

CNTR:

EPA ID: IAR000521237

SELGAM CONTAINERS MANUFACTURING CORPORATION

1225 DIVISION ST.

BURLINGTON, IA 52601

CUST DEPT:

CUST ITEM:

CUST CNTR:

START DATE:

3/5/17

# HAZARDOUS WASTE

## UN1993

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UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PGII, (BUTANOL, METHYL ISOBUTYL KETONE), ERG#128

NAME: LIQUID D&I WASTE (SOLVENT)

0001

WS: 151842-4

MTN:

LN:

LOC:

TRX:

PROF:

PC:

CNTR:

EPA ID: IAR000521237

SILGAN CONTAINERS MANUFACTURING CORPORATION

3725 DIVISION ST.

BURLINGTON, IA 52601

CUST DEPT:

CUST ITEM:


CUST CNTR:

START DATE:

4-2-17

Kelly Morris Retraining 5-4-17

Travis - Travis Baysinger  
TB

Burlington, IA Weekly Hazardous Waste Storage Area Inspection												
Month:					 <small>CONTAINERS MANUFACTURING</small>							
Inspector:												
Signature:									All checks within a gray box must be addressed under "corrective actions"			
Week Ending:												
Hazardous Waste Storage Area												
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
TB Container(s)	Are any containers open?											
	Are any containers severely rusted?											
	Are any container heads bulging?											
	Are any containers dented so the integrity is compromised?											
	Are any containers leaking?											
TB Container(s) Marking and Labeling	Accumulation start date marked on all container(s)?											
	Hazardous waste warning label on all container(s)?											
	Does the description on the container label match the contents?											
	Are labels legible and in good condition?											
TB Container(s)	Labels of previous contents removed or obscured?											
	Is adequate aisle space (18") present?											
	Are containers stored with labels facing outward?											
	Are incompatible containers separated from each other? (example: no acids by caustics and no oxidizers by flammables)											
TB Inside Store Area	Is the area secured? Doors, gates closed, locked?											
	Does the containment area have structural defects?											
	Are there any leaks or residues on the floor?											
Is area identified as Hazardous Waste Storage Area?												
Corrective Actions:												
Satellite Accumulation Area(s)												
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
TB Container(s) Condition	Are containers closed?											
	Are any containers severely rusted?											
	Are any container heads bulging?											
	Are any containers dented so the integrity is compromised?											
	Are any containers leaking?											
TB Container(s) Marking and Labeling	Are non-self closing funnels closed and latched?											
	Hazardous waste warning label on all container(s)?											
	Does the description on the container label match the contents?											
	Are labels legible and in good condition?											
TB Container(s) Storage	Labels of previous contents removed or obscured?											
	Are FULL satellite area containers greater than 3 days old?											
	Is the accumulation point free of severe structural deterioration?											
Is adequate aisle space (18") present?												
Are drip pans and pails empty?												
Corrective Actions:												
Emergency Response Equipment												
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
TB Telephone	Is telephone easily accessible in case of emergency?											
	Is telephone in working order?											
	Are emergency numbers posted nearby?											
TB Spill Control	Is an empty salvage drum nearby and readily accessible?											
	Is unused absorbent material nearby and readily accessible?											
	Is all personal protective equipment nearby? (example: gloves, boots, apron, goggles)											
TB Fire Safety	Is a fire extinguisher nearby, in tact, & readily accessible?											
Corrective Actions:												

Kelly Morris

## **Finding 5: Corrective Action Supporting Evidence**





